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JAP:MKM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 21, U.S.C., §§ 952(a)
and 960)

RAQUEL RICHARDSON,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

TAMIKA COMRIE, being duly sworn, deposes and says that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about June 4, 2012, within the Eastern District of New York and elsewhere, the defendant RAQUEL RICHARDSON did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for her belief are as follows:^{1/}

1. On or about June 4, 2012, the defendant RAQUEL RICHARDSON arrived at JFK International Airport ("JFK") in Queens, New York aboard Jet Blue flight number 780 from Montego Bay, Jamaica.

2. The defendant RAQUEL RICHARDSON was selected for a Customs and Border Protection ("CBP") enforcement examination of her luggage. During that inspection, the defendant acknowledged ownership of a "Samsonite" brand suitcase.

3. During the examination of the suitcase, the CBP officer noticed a black bag contained within jean shorts inside the suitcase. The CBP officer opened the black bag, which contained two plastic clear bags, which appeared to contain pellets in blue wrapping. A probe of one of the pellets revealed a white powdery substance, which field tested positive for the presence of cocaine. The total approximate gross weight of the white powdery substance in the defendant RAQUEL RICHARDSON's suitcase was 2,412.4 grams.

^{1/} Because the purpose of this affidavit is merely to establish probable cause, I have not set forth all of the facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that the defendant RAQUEL RICHARDSON be dealt with according to law.



TAMIKA COMRIE
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
5th day of June, 2012

HONORABLE JOAN M. AZRACK
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK